

**REMARKS**

In response to the Office Action dated June 26, 2001, Applicants respectfully request reconsideration. Claims 11-15 and 27-32 are pending in the application, of which claims 11 and 27 are independent claims, claims 11 and 27 have been amended, and claims 28-32 have been added. New claims 28-32 have been added to further detail Applicants' invention.

In paragraph 4 of the Office Action, claims 11-15 and 27 were rejected under 35 U.S.C. §112 second paragraph as being indefinite due to certain informalities. Applicants have addressed each of these informalities and respectfully submit that these claims comply with 35 U.S.C. §112.

In paragraph 5 of the Office Action, claims 11-15 and 27 were rejected under 35 U.S.C. §103 as being obvious over Gellert (U.S. Patent 4,521,179). Applicants respectfully request reconsideration of this rejection as claim 11, as amended, and claim 27 patentably distinguish over Gellert.

The Examiner states in paragraph 6 that it would have been obvious to decouple the valve pin from the piston, as recited in claim 11, since "the removable cap 50 and the plug 58 are removable which would give access to the screw 126 which is connected to the coupling 130. Thus, the screw 126 would have been decoupled from the valve pin (118 and 130) while the clamp plate (back-plate 24) remains coupled to the manifold plate 114 and the movable mold plate 36, and while the actuator (piston 44) remains mounted in the clamp plate 24."

Applicants do not agree that this is an obvious reading of Gellert. Furthermore, this approach would result in the distinct disadvantage of compromising the seal

between removable cap 50, piston 44, and fluid duct 60, which is a disadvantage Applicants' invention overcomes: "With the system of the present invention, there is no need to drain the hydraulic fluid for disassembly, and there is no need to remove the valve pin from the hot runner manifold." See Applicants' Specification, page 9, lines 1-2. Conversely, with the approach suggested by the Examiner there would be a need to compromise the seal about the piston 44 and drain the hydraulic lines in Gellert. Accordingly, Applicants have amended claim 11 to recite that the piston is "sealingly mounted within the valve pin" and that when step A is performed "the piston remains sealingly mounted within the valve pin actuator." In Gellert, the piston 44 cannot remain sealingly mounted within the valve pin actuator when the valve pin is decoupled from the piston, because cap 50 must be removed which would compromise the seal with piston 44. Accordingly, it is respectfully submitted that claim 11 patentably distinguishes over Gellert and that the rejection under §103 should be withdrawn.

Claims 12-15 and 32 depend from claim 11 and are allowable for at least the same reasons.

Claim 27 also patentably distinguishes over Gellert. It is noted that the Examiner did not specifically treat claim 27 which relates to adjusting the position of valve pin while the valve pin is decoupled from the piston, while the clamp plate and the valve pin actuator remain coupled to the mold, and while the valve pin remains extended into the manifold. See Applicants' Specification, page 9, lines 24-30. In fact, Gellert does not disclose or suggest adjusting the axial position of the valve pin at all. Gellert does disclose adjusting the rearward movement of piston 44 by "using a sleeve 136 of a different height." See column 6, line 25-26. Claim 27, however, recites that the

adjustment is performed "while the valve pin is decoupled from the piston." In Gellert, if the valve pin 118 is decoupled from the piston 44, screw 128 is no longer attached to valve pin 118 via coupling 130, leaving no means by which the axial position of valve pin 118 can be adjusted. Accordingly, it is respectfully submitted that claim 27 also patentably distinguishes over Gellert and that the rejection under §103 should be withdrawn with respect to this claim as well. Claims 28-31 depend from claim 27 and are allowable for at least the same reasons.

Any amendments or cancellation of claims made herein is made without prejudice and is not an admission that said amended or canceled subject matter is not patentable. Applicants reserve the right to pursue said canceled or amended subject matter in one or more continuation applications.

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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